

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

DONALD J. TRUMP FOR PRESIDENT, INC.; et al.,) CIVIL ACTION
)
)
Plaintiffs,)
)
v.) No. 2:20-CV-966
)
KATHY BOOCKVAR; et al.,)
)
Defendants.) JUDGE NICHOLAS RANJAN

STIPULATION

Plaintiffs and the undersigned Bradford County Election Boards hereby stipulate as follows:

1. The undersigned County Election Boards desire a prompt resolution of this case in order to have direction on how to properly proceed in the upcoming November 2020 General Election. Accordingly, the undersigned County Election Boards stipulate and agree to not contest the declaratory and injunctive relief requested by Plaintiffs in their Amended Complaint and to be bound by whatever relief the Court may enter in this case.

2. To the extent reasonably possible and in the absence of agreed upon extension by Plaintiffs, the undersigned County Election Boards stipulate and agree that they shall, by August 5, 2020, answer and respond fully and completely, subject to only objections concerning privilege, the written interrogatories and document requests served upon them by Plaintiffs on July 24, 2020, and produce to Plaintiffs' counsel all requested non-privileged items and documents.

3. In exchange for the undersigned County Election Boards' stipulation and cooperation in discovery, Plaintiffs stipulate and agree to forego any claim for attorneys' fees and

costs against only the undersigned County Election Boards and agree not to enter default or seek any further response from the undersigned County Election Boards in this case.

4. To the extent the deposition testimony or other sworn statement of the undersigned Bradford County Election Boards shall be reasonably necessary for evidentiary purposes, Plaintiff and the undersigned County Election Boards stipulate and agree to reasonable cooperate with each other to provide such testimony or statement in the least burdensome manner.

Respectfully submitted,

PORTER WRIGHT MORRIS & ARTHUR LLP

Dated: August 6, 2020

By: /s/ Ronald L. Hicks, Jr.

Ronald L. Hicks, Jr. (PA #49520)
Jeremy A. Mercer (PA #86480)
Russell D. Giancola (PA #200058)
Six PPG Place, Third Floor
Pittsburgh, PA 15222
(412) 235-4500 (Telephone)
(412) 235-4510 (Fax)
rhicks@porterwright.com
jmercerc@porterwright.com
rgiancola@porterwright.com

and

Matthew E. Morgan (DC #989591)
(admitted pro hac vice – ECF #10)
Justin Clark (DC #499621)
(pro hac vice motion pending – ECF #27)
Elections, LLC
1000 Maine Ave., SW, 4th Floor
Washington, DC 20224
(202) 844-3812 (Telephone)
matthew.morgan@electionlawllc.com
justin.clark@electionlawllc.com

Counsel for Plaintiffs

Dated: August 4, 2020

By: /s/ Daryl Miller
Daryl Miller
Chairman of Bradford County Board of Elections
301 Main Street
Towanda, PA 18848
(570) 265-1727 (Telephone)

By: /s/ Douglas McLinko
Douglas McLinko
Bradford County Board of Elections
301 Main Street
Towanda, PA 18848
(570) 265-1727 (Telephone)

By: /s/ John Sullivan
John Sullivan
Bradford County Board of Elections
301 Main Street
Towanda, PA 18848
(570) 265-1727 (Telephone)